

STEPHEN M. STRADTMAN
Plaintiff,
v.
REPUBLIC SERVICES, INC., *et al.*,
Defendants.

Plaintiff Stephen M. Stradtman (“Plaintiff” or “Mr. Stradtman”), by counsel, has moved this Court for an Order granting an extension of time from Thursday, July 9, 2015 to July 16, 2015 (and to move the hearing date from July 16, 2015 to July 30, 2015), for Plaintiff to file and serve Plaintiff’s Opposition to Defendants’ Motion for Attorneys’ Fees and Costs, Supporting Memorandum, and Proposed Order (collectively, the “Motion”), due to the intervening Fourth of July holiday, counsel’s attendance at an Annual Conference in Atlanta, Georgia the weekend the Motion was filed, and previously-scheduled travel.

1. There is no trial date and the case is closed. As such, the one week delay would not affect any matters pending before this Court (other than argument on the Motion).

2. Plaintiff's counsel was traveling and attending a conference (speaking on a panel and later presenting to the Executive Board of the sponsor of the Conference) in Atlanta from June 25 to June 28, 2015.

3. Plaintiff's counsel is also scheduled to travel out of town for the Fourth of July holiday, from July 3 to July 6, 2015, with family.
4. Plaintiff's Opposition to the Motion for Attorneys' Fees and Costs is due on July 9, 2015.
5. Defense counsel have represented that they consent to an extension of the deadline for the Opposition from July 9, 2015 to July 16, as well as to the July 30, 2015 hearing date.
6. Plaintiff is mindful that extensions of time are generally looked upon with disfavor, and respectfully submits that a short extension of time will not materially affect any other deadlines set by this Court or the timely resolution of this case. No prejudice to the Court, the parties, or the administration of justice will result.
7. A proposed Order is attached for the Court's consideration.

July 2, 2015

Respectfully submitted:

/S/ CARLA D. BROWN

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CERTIFICATE OF SERVICE

I hereby certify on the 2nd day of July 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notification of such filing to the following:

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